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Company II, LLC, *et al.*, Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
HONORABLE DONALD H. STECKROTH
CASE NO. 13-13653 (DHS)

In re:

710 LONG RIDGE ROAD OPERATING
COMPANY II, LLC, *et al.*,¹

Debtors-in-Possession.

Chapter 11
(Jointly Administered)

**NOTICE OF DEBTORS' MOTION FOR
AN ORDER AUTHORIZING THEM TO
(I) ENTER INTO LETTER
AGREEMENT IN CONNECTION WITH
ANTICIPATED EXIT FINANCING AND
(II) INCUR AND PAY RELATED FEES
AND EXPENSES AS ADMINISTRATIVE
EXPENSES**

HEARING DATE AND TIME:

December 5, 2013, at 10:00 a.m.

**ORAL ARGUMENT WAIVED UNLESS
OBJECTIONS TIMELY FILED**

TO: All Parties-in-Interest

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal identification number are: 710 Long Ridge Road Operating Company II, LLC d/b/a Long Ridge of Stamford (4809), 240 Church Street Operating Company II, LLC d/b/a Newington Health Care Center (4730), 1 Burr Road Operating Company II, LLC d/b/a Westport Health Care Center (4839), 245 Orange Avenue Operating Company II, LLC d/b/a West River Health Care Center (4716) and 107 Osborne Street Operating Company II, LLC d/b/a Danbury Health Care Center (4676).

PLEASE TAKE NOTICE that on December 5, 2013, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, attorneys for 710 Long Ridge Road Operating Company II, LLC d/b/a Long Ridge of Stamford, 240 Church Street Operating Company II, LLC d/b/a Newington Health Care Center, 1 Burr Road Operating Company II, LLC d/b/a Westport Health Care Center, 245 Orange Avenue Operating Company II, LLC d/b/a West River Health Care Center and 107 Osborne Street Operating Company II, LLC d/b/a Danbury Health Care Center, the within debtors and debtors-in-possession (the “**Debtors**”), shall move before the Honorable Donald H. Steckroth, United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, New Jersey 07102, for an Order authorizing them to (I) enter into letter agreement in connection with anticipated exit financing and (II) incur and pay related fees and expenses as administrative expenses.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application, which set forth the factual and legal bases upon which the requested relief should be granted. A proposed Order granting the relief requested in the Motion is also being submitted.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “**General Order**”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “**Supplemental Commentary**”) (the General Order, the Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at

www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that oral argument is waived unless objections are timely filed.

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FORMAN & LEONARD, P.A.
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Company II, LLC, *et al.*, Debtors-in-Possession

By: /s/ Michael D. Sirota
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DATED: November 14, 2013